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San Francisco Bay Regional Water Quality Control Board

(Sent via email: [rimmer.leigh@epa.gov](mailto:rimmer.leigh@epa.gov))

January 25, 2019

File: CW-803476 and CW-717712

Ms. Leigh Rimmer  
Office of Pesticide Programs Docket  
Environmental Protection Agency Docket Center (28221T)  
U.S. Environmental Protection Agency (U.S. EPA)  
1200 Pennsylvania Ave., NW.  
Washington, DC 20460-0001

**Subject: Metam Sodium and Metam Potassium – Draft Risk Assessment (EPA-HQ-OPP-2013-0140)**

Dear Ms. Rimmer:

Please accept these comments on the Draft Risk Assessment for the root control chemical metam sodium. The San Francisco Bay Regional Water Quality Control Board (Water Board) is the California State agency responsible for restoring, maintaining, and protecting the beneficial uses of surface and ground waters in the San Francisco Bay Region. To protect waters within our jurisdiction, we issue federal National Pollutant Discharge Elimination System (NPDES) permits to about 50 wastewater treatment plants. These permits require wastewater agencies (also known as publicly owned treatment works, or “POTWs”) to prevent collection system blockages and untreated sewage spills. Tree roots are the leading cause of collection system blockages, and metam sodium is widely used to control tree root intrusion in wastewater collection systems. Consequently, the Water Board is especially interested in the registration review decision for metam sodium.

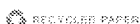
The Draft Risk Assessment did not assess risks related to metam sodium’s use in wastewater collection systems. The Water Board seeks to protect the safety of workers who regularly enter wastewater collection systems for monitoring and maintenance. The Water Board requests that U.S. EPA:

- recognize the potential for significant risks from exposure to metam sodium and its degradate, methyl isothiocyanate (MITC), if workers inadvertently enter collection systems undergoing treatment, and
- implement a minor label language change to ensure worker safety protection.

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The Water Board appreciates that current metam sodium labels include a requirement to notify downstream POTWs about impending metam sodium application. We also appreciate and support the existing requirements to inform the POTW of the maximum application quantity (essential for protection of POTW operations) and to notify POTWs about metam sodium's process interference hazard, as some POTWs may not be aware of this risk.

However, because of the potential safety hazards metam sodium poses to POTW workers who enter the collection systems and the risk of interference with wastewater treatment operations, as U.S. EPA noted in its proposed decision, the Water Board recommends a minor but meaningful revision to the proposed label language. The label instructions should explicitly require at least 24 hours prior to applications and to specifically address worker safety protection. Adding the 24-hour advance to the notification requirements would provide adequate time for POTW operators to prepare for and avoid health hazards and treatment process interferences. The Water Board also fully concurs with the comments on the proposed metam sodium registration review decision submitted by the Bay Area Clean Water Agencies (BACWA).

### **Requested Modifications to Metam Sodium POTW Notification Label Instructions**

The Water Board's suggested revisions to the metam sodium label instructions are shown below in bold and underlined font:

*This product must be used only where wastewater treated for root control will be processed through a wastewater treatment facility. Applicators must notify downstream waste water treatment facilities **at least 24 hours** prior to the start of metam sodium applications so **they can protect worker safety by restricting staff from entering downstream collection system lines** and that they may monitor the operations of the wastewater treatment plant. Applicators must report how much product will be applied to the sewage system to operators of downstream water treatment plants and ~~to~~ inform these operators that high concentrations of these chemicals in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants. Never exceed the daily use of more than 15 gallons of Sanafoam Vaporooter II Liquid Concentrate for each million gallons of sewage flow (MGD) into the wastewater treatment plant (WWTP). Example: Inflow into the WWTP is 2.4 MGD, therefore, use a maximum of 36 gallons (2.4 x 15) of Sanafoam Vaporooter II per day. When Vaporooting within one mile distance of the WWTP or when applying at night reduce the maximum application use by 50 % to 18 gallons (36 x .5). The above maximum daily use must extend over an eight hour work period.*

### **POTW Notification Should Require at least 24 Hours Prior to Application**

A minimum of 24 hours between notification to POTWs and the start of metam sodium application is essential to provide adequate time for POTW operators to ensure their safety and operational integrity of their treatment plants. U.S. EPA's proposed language allows for as little as a few minutes between POTW notification and metam sodium application. With less than a 24-hour notice, it is possible that workers could already be in the collection system when the metam sodium application occurs, or that POTW operators would not have sufficient time to prepare their operations for an influx of metam sodium to their biological treatment units. Labels

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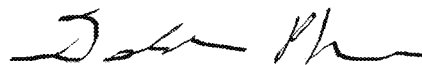
for other root control pesticides will also require a 24-hour advanced notification to the downstream POTW.<sup>1</sup>

**POTW Notification Should Mention Worker Safety**

Due to the health risks associated with direct exposure to metam sodium treatment solutions and the rapidly formed degradate MITC, it is imperative that workers do not open and enter manholes in areas undergoing metam sodium treatment. Because of the extensive lengths of treatment zones, chemical applicators would be unable to view all manholes affected by metam sodium treatment. Therefore, it is not possible to guarantee worker safety through visual measures alone. Due to the paramount importance of POTWs to ensure the safety of their workers, the Water Board urges U.S EPA to revise the proposed label instructions to prevent workers from entering manholes and the collection system in and downstream from treatment areas.

The Water Board thanks the U.S. EPA for the opportunity to offer feedback on the Draft Risk Assessment for metam sodium and appreciates the important work the Office of Pesticide Programs does through the pesticide registration review process. For any questions, please contact Debbie Phan at [debbie.phan@waterboards.ca.gov](mailto:debbie.phan@waterboards.ca.gov) or (510) 622-2116 as needed.

Sincerely,



Debbie Phan  
Water Resource Control Engineer

cc: *via email:*

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<sup>1</sup> See the Diquat Dibromide Proposed Interim Registration Review Decision, Case Number 0288, September 2016 (EPA-HQ-OPP-2009-0846)

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